



City of Seattle Seattle Planning Commission

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November 16, 2006

Honorable Councilmember Peter Steinbrueck
Chair, Urban Development and Planning Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Seattle Planning Commission Comments on the Proposed 2006 Amendments to Seattle's Comprehensive Plan.

Dear Councilmember Steinbrueck:

The Planning Commission is pleased to provide you and the City Council with its comments and recommendations on the 2006 Proposed Comprehensive Plan Amendments. As the stewards of the Comprehensive Plan we know that changes to this document are vital for shaping the future of Seattle. We offer the following recommendations;

Amendment #1: Add triangle bounded by Aurora Avenue, Denny Way, and Broad Street to the Uptown Urban Center.

Commission Comments: The Planning Commission agrees with approval of these proposed amendments. This is a rapidly growing area and inclusion in the Uptown Urban Center will better enable this area to plan for growth.

Amendment #2: Replace the current goals and policies for the Roosevelt Residential Urban Village with a new set of goals and policies.

Commission Comments: The Planning Commission agrees with approval of this proposed amendment. Overall, the plan achieves the goals of updating the neighborhood plan in a way that will best realize the coming of the light rail station. We applaud the neighborhood community council for their efforts at revising its plan to better enable the station in its commercial business district.

The Commission strongly suggests that the City undertake an additional Station Area Planning effort in order to address the new station and also to ensure that there is a clear plan that outlines such things as mitigation for construction impacts during the building of the light rail. Local businesses could be greatly impacted during construction and the City will need to have an adequate plan in place to support residents and neighborhood businesses during this time.

Amendment # 3: Amend the First Hill Urban Center policies to remove reference to a light rail station.

Commission Comments: This amendment is a technical change to ensure that the Comprehensive Plan is consistent with the updated plans for the light rail system which no longer includes a station in this area. The Planning Commission agrees with approval of this proposed amendment.

Amendment #4: Amend the policy that guides open space requirements in urban centers.

Commission Comments: The Commission supports the approval of this proposed amendment. It would change the open space and required yards policy to limit its application only to areas outside Urban Centers. It anticipates proposals that will address urban center open space in other ways, including impact fees. We believe that the amendment provides a better distinction between the needs of Urban Centers versus those “outside Urban Centers,” thus recognizing the different character and growth pressure that exists within Urban Centers. The Planning Commission has been working with City staff in their effort to develop open space impact fees as one way to fund larger public open spaces in the Urban Centers. We have been supportive of the concept of impact fees for open space. The changes outlined in the amendment will better enable the City to adopt other approaches to the provision of open space, beyond the current policy requirement that these “areas be provided as part of construction of dense office buildings and all residential buildings,” and will generally allow more flexibility to meeting the open space and recreational needs of Seattle residents.

Amendment # 5. Update South Lake Union neighborhood plan goals and policies to reflect new status as urban center and new growth targets.

Commission Comments: The Comp Plan changes related to South Lake Union generally make sense and should be approved. City staff should be commended for their extensive public involvement and outreach efforts. The Planning Commission has worked closely with DPD staff and the community in revising the neighborhood goals and policies to make them more consistent with the goals of the Comp Plan and the Growth Management Act as they relate to designated Urban Centers. In 2004 the South Lake Union neighborhood was designated as an Urban Center. More household and job growth targets have been created that require a significant shift in thinking about this neighborhood.

In regards to the amendment that will update the Future Land Use Map from Industrial Commercial to Seattle Mixed, the Planning Commission takes no position. The Planning Commission has been very concerned about the City allowing conversion of land from industrial zoning to any other zone before an industrial lands strategy is developed. We feel that an industrial lands strategy is critical to having a rational basis for the City’s decisions regarding individual requests for zoning changes such as this one, and should be in place to guide such decisions. We recognize that this effort is now well underway and we have been assisting City staff in their preliminary work in this effort.

The Commission has recommended that part of the strategy should include developing criteria for evaluating future decisions to reclassify industrial land. Such criteria will likely include factors such as whether the industrial area in question is within a Manufacturing and Industrial Center (MIC) or whether there has been a significant re-designation of the area that has included significant analysis, as is the case in this instance. It is likely that this area is indeed ripe for change. Using such criteria we suggest that the Seattle Mixed zoning seems appropriate given this area is in an Urban Center, not part

of the MIC and has undergone an extensive public involvement effort. We will continue to closely monitor proposed zoning changes to the Urban Centers, including the rezone to this area.

Amendment # 6: *Strengthen the City's commitment to the use of zoning incentives for affordable housing.*

Commission Comments: The Commission supports this proposed amendment to the Comp Plan. We have not had much time to review the analysis, however on its surface it appears to be consistent with the goals, policies and strategies of the City by seeking to ensure that new zoning capacity (i.e. legislative rezones or text amendments resulting in significantly greater allowable height, bulk or density) is accompanied by increased public benefits with an emphasis on creating greater incentives for production of lower-income or moderate-income housing. The Commission strongly supports this goal. This amendment seeks to take advantage of new policies passed by the State Legislature last year and helps to move the city in the right direction in meeting important housing goals.

Amendment # 7: *Amend shoreline land use and transportation policies to address the replacement of State Route 99 (Alaskan Way Viaduct) and Seawall.*

Commission Comments: The Planning Commission supports the proposed Comp Plan amendments. These amendments are predominately technical in nature and seek to amend shoreline policies to facilitate construction, long-term temporary relocation of utilities, and other aspects of the State Route 99 (Alaskan Way Viaduct/Seawall) replacement. It essentially lays the groundwork for policy changes to allow for the needed work to replace SR 99 in the Seattle Shoreline District. The Commission concurs that a replacement for the State Route 99 Viaduct may be located in the Shoreline District because it represents a critical link in the transportation network. The Commission also supports the proposed amendment to stipulate that only seawall reconstruction and either a tunnel with a surface roadway or a surface roadway be permitted under city policy.

Amendment # 8: *Amend the Future Land Use Map from Industrial to Commercial/Mixed Use for an area located between S. Dearborn Street, S. Weller Street, Rainier Ave S. and 12th Avenue S.*

Commission Comments: The Planning Commission takes no position on this amendment. However, we note again for the record that the Planning Commission has been very cautious about the City allowing conversion of land from industrial zoning to any other zone before an industrial lands strategy is developed. An industrial lands strategy is critical to having a rational basis for the City's decisions regarding individual requests for zoning changes such as this one, and should be in place to guide such decisions. Again, as stated above in our comments to proposed amendment #5 we are delighted to see that this effort is now well underway. The question for Council is whether or not to postpone this particular Comp Plan amendment until the 2007 Comprehensive Plan amendments, when both the Livable South Downtown Plan and the Industrial Lands Strategy will be completed and will better inform the decision about this particular area. We also note that this area is in a designated Urban Center and is not in an MIC, which should weigh in to the ultimate decision about re-designation.

Amendment # 9: *Provide greater direction on priorities for pedestrian safety improvements.*

Commission Comments: The Commission endorses this proposed amendment. We have had little time review the analysis of this amendment. It is our understanding that it calls for outlining the City's

priorities for new pedestrian safety improvements. These include; areas with a history of accidents; areas that are experiencing high levels of growth; and when providing new facilities or upgrading existing facilities. It would direct that areas with high levels of growth be addressed in the City's Pedestrian Master Plan, which is proposed to be started by the Seattle Department of Transportation in early 2007. On the surface these priorities appear to make sense and we recommend that they be further analyzed in the development of SDOT's Pedestrian Master Plan. The Commission strongly supports strengthening and enhancing city policies that improve pedestrian safety.

Amendment #10: *Strengthen the City's support of pedestrian ferry systems.*

Commission Comments: The Commission supports this proposed amendment. We have had little time to review the analysis of this amendment. This amendment seeks to highlight the City's policies with regard to providing transportation alternatives to single occupancy vehicle trips. The City should clearly signal and clarify for other transportation partners that Seattle goals and priorities are to limit the number of single occupancy vehicle trips as much as possible. This amendment provides good clarification and is a great addition to the Comp Plan.

Amendment # 11: *Defer consideration to designate North Highline a Potential Annexation Area until certain conditions are met. The UDP Committee may consider PAA designation in December if the conditions are met by that time.*

Commission Comments: The Planning Commission generally agrees with approval of this proposed amendment. The Planning Commission takes a regional view of growth management issues and recognizes that annexing unincorporated areas into local jurisdictions is an important goal of the Growth Management Act (GMA) and the City of Seattle has consistently been a leader in ensuring that the GMA is implemented. We recognize that the Council has outlined concerns about the acceptable terms with King County and we recommend that such negotiations continue. We also recognize that the State legislature recently passed legislation that extends a sales tax credit to jurisdictions with populations of fewer than 400,000 as an incentive for annexing unincorporated communities. The Commission believes that this legislation should be extended to include all jurisdictions recognizing that real challenges exist in annexing an area as significant as North Highline. The Planning Commission has been following this issue for the last year and we have generally been supportive of the idea of annexation. We urge you to continue working to come to an acceptable agreement with the County, the City of Burien, and the neighborhoods of North Highline.

Amendment # 12: *Defer the decision until December 2006 on amending the shoreline policies to allow flexibility for the expansion of the Ferry Terminal at or adjacent to Colman Dock, including raising the height limit and allowing non-water dependent uses*

Commission Comments: The Planning Commission supports the deferment of this proposed amendment until additional information and analysis can be completed. The Commission has been concerned with the number of vehicle holding spaces proposed by the Washington State Ferry Service. The Commission is also concerned about setting a precedent about what is acceptable for non-water dependant uses over water, especially when considering the size of structure's impacts of views. As we understand it the current proposal would be a significant departure from city policy.

We appreciate all of the work done by the Executive, the Council and by a number of citizens, in developing the 2006 Comprehensive Plan Amendments. It is through such collaborative efforts that we ensure Seattle's Comprehensive Plan provides a dynamic policy framework for the future. Thank you for the opportunity to provide comments and we are happy to discuss these recommendations in more detail as you wish.

Sincerely,

A handwritten signature in cursive script, reading "Jerry Finrow".

Jerry Finrow, Chair

cc: Mayor Greg Nickels
Seattle City Council Members
Tim Ceis, Nathan Torgelson, Mayor's office
Rebecca Herzfeld, Keitel Freeman Council Central Staff
Diane Sugimura, John Rahaim, Tom Hauger, John Skelton, Lish Whitson, Mark Troxel, DPD

SPC RECORD OF RECUSAL

Commissioner George Blomberg recused himself from all Planning Commission discussion related to proposed amendment #12